

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

JAMES AND KELARA GHAI SAR,	)	
Individually and as Personal Representatives	)	
and Co-Administrators of the Estate of Bijan C.	)	
Ghaisar, Deceased,	)	
	)	Case No. 1:19-cv-1224 (CMH/IDD)
Plaintiffs,	)	
	)	
v.	)	
	)	
UNITED STATES OF AMERICA,	)	
Defendant.	)	

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**UNITED STATES OF AMERICA’S WITNESS LIST**

Pursuant to the Court’s Orders of January 15, 2020 (Dkt. 17), May 1, 2020 (Dkt. 34), and June 25, 2020 (Dkt. 39), Defendant United States of America, through its undersigned counsel, hereby respectfully submits its list of potential witnesses for trial in the above-captioned matter.

**WITNESSES**

In accordance with Federal Rule 26(a)(3), the witnesses listed below who are marked with an asterisk are those Defendant expects to present at trial. The additional witnesses designated are those Defendant may call if the need arises. Defendant reserves the right to seek to present the testimony of such witnesses by de bene esse deposition or through discovery deposition testimony if the witness in question is, unbeknownst to Defendant at the present time, unavailable for trial. The witness list below reflects the present status of this litigation. Accordingly, Defendants reserve the right to amend this list—including eliminating proposed witnesses— should further litigative developments (including, *inter alia*, positions advanced by Plaintiff) warrant.

1. Jonathan Alto

2. Michael Alto
3. Alejandro Amaya\*
4. Anthony Carucci
5. Stephanie Citro
6. Patricia Clark
7. Matthew Cook\*
8. Shane Crittenden, D.O., M.B.A.
9. Jonathan Daniels
10. Larry Decker
11. John Dillon\*
12. Nicole Duff
13. Christina Evans
14. Gerard Francisco\*
15. Christopher Giblin
16. Anthony Glaze
17. Daniel C. Gohn
18. Christine A. Haddix
19. Christopher Hartley
20. Carl Holmberg
21. Brian Humbertson\*
22. Brian Huss
23. Evan Jacobson, M.D.\*
24. Sean Kellenberger

25. James V. Koch, Ph.D.\*
26. Julie Lawrence
27. Annamarie Lichiello
28. Robert MacLean
29. Anthony McSherry
30. Christopher Meyer
31. George Nikolis
32. Kiana Nurideen
33. Carol L. O'Neal, Ph.D.
34. Monique Pettett
35. Jocelyn Posthumus, M.D.
36. John Ryan\*
37. Jacob T. Sipe\*
38. Michael Smith
39. Robert Steinheimer
40. Lucas Vinyard\*
41. Steven Wood
42. Michael Young
43. Jonathan B. Zeitlin
44. Adam Zielinski
45. Any witness necessary to authenticate records and/or establish the manner in which  
records were kept.
46. Any other witnesses designated by Plaintiff to whom Defendant does not object.

47. Witnesses that may become necessary for rebuttal based on testimony in Plaintiff's case-in-chief.

Respectfully submitted,

G. ZACHARY TERWILLIGER  
UNITED STATES ATTORNEY

By: \_\_\_\_\_/s/\_\_\_\_\_  
DENNIS C. BARGHAAN, JR.  
Deputy Chief, Civil Division  
KIMERE J. KIMBALL  
MEGHAN LOFTUS  
Assistant United States Attorneys  
Office of the United States Attorney  
Justin W. Williams U.S. Attorney's Building  
2100 Jamieson Avenue  
Alexandria, Virginia 22314  
Tel: (703) 299-3891/3763  
Fax: (703) 299-3983  
Dennis.barghaan@usdoj.gov  
kimere.kimball@usdoj.gov  
Meghan.loftus@usdoj.gov

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